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REF: Comments regarding proceeding 03-104 (BPL)

Gentlemen:

The proposal to propagate broadband internet access via power line could have disastrous consequences to the continuing viability of virtually all users of spectrum between 1.5 and 80 MHz – even if emissions are held within current Part 15 guidelines. Such use would cause spectrum pollution affecting not only amateur radio allocations including the ability of the service to perform its public service function but also military, Red Cross, and other state and local emergency communication frequencies to name just a few.

Initial field studies have already been done by the American Radio Relay League of actual interference that is generated by beta testing of BPL service in Maryland, Pennsylvania, Virginia and New York. The claims made by public utilities that it will not cause interference have already been proven incorrect. See the following link --

http://www.arrl.org/news/stories/2003/08/08/2/?nc=1

BPL service will render all but the strongest signal communication useless and the power lines themselves will be acting as antennas to propagate the interference.

A utility would have no economically or logistically practical means to maintain a system in compliance with suitable isolation from HF interference. Part 15 guidelines won't be a sufficient to eliminate the potential interference problems.

In addition, currently licensed services operating legally may interfere with BPL service. How many complaints can the Commission handle? There are literally millions of transmitters operating on the HF frequencies.

While the concept of bringing broadband internet capability to the public may have merit, the technology to do so must not severely impair our HF spectrum capabilities. Other technologies are available and in my opinion are propagating at sufficient speed to meet the majority of public need.

Thank you for your consideration.